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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

KNOLL INC.,

Plaintiff,

v.

MODWAY, INC., et al.,

Defendants.

Civil Action No.  
3:20-cv-16576-FLW-DEA

**PLAINTIFF KNOLL INC.'S NOTICE OF MOTION  
TO ENFORCE THE SETTLEMENT**

PLEASE TAKE NOTICE that Plaintiff Knoll Inc. ("Knoll") will move before this Court at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, before The Honorable Freda Wolfson, on May 2, 2022, or as soon thereafter as counsel may be heard, for entry of an Order to enforce the parties' settlement.

PLEASE TAKE FURTHER NOTICE that Knoll will rely upon the accompanying memorandum of law, the Declaration of Ali Razai, with exhibits, and upon all pleadings and proceedings on file herein.

Respectfully submitted,

MCCARTER & ENGLISH LLP

Dated: April 5, 2022

By: /s/ Cynthia S. Betz

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### **CERTIFICATE OF SERVICE**

I hereby certify that, on the date noted below, the foregoing PLAINTIFF KNOLL INC.'S NOTICE OF MOTION TO ENFORCE THE SETTLEMENT and supporting papers were filed on CM/ECF, which will cause notice on all counsel of record that constitutes service. Copies of filings made under seal have been served on counsel of record by way of email.

Dated: April 5, 2022

/s/ Cynthia S. Betz  
Cynthia S. Betz

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